

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

IAN HUMPHREY,

Plaintiff,

SPECIAL VERDICT

v.

NAVIENT SOLUTIONS, INC.,

16-cv-370-jdp

Defendant.

We, the jury, for our special verdict, do find as follows:

QUESTION 1: Did defendant Navient Solutions, Inc. fail to conduct a reasonable investigation in response to any of the following notices:

July 2, 2014 notice from Equifax: _____ (Yes) or No)

July 3, 2014 notice from Experian: _____ (Yes) or No)

July 8, 2014 notice from Trans Union: _____ (Yes) or No)

August 2014 notice from Trans Union: _____ (Yes) or No)

November 2014 notice from Innovis: _____ (Yes) or No)

April 2015 notice from Equifax: _____ (Yes) or No)

September 2015 notice from Trans Union: _____ (Yes) or No)

If you answered YES to Question 1 as to any of the notices, answer Question 2. If you answered NO as to all notices, do not answer any more questions.

QUESTION 2: Was Navient's failure to conduct a reasonable investigation a substantial factor in causing harm to Humphrey?

ANSWER: _____ (Yes) or No)

If you answered YES to Question 2, answer Question 3. If you answered NO to Question 2, do not answer any more questions.

QUESTION 3: What amount of money, if any, would fairly and adequately compensate Humphrey for the harm caused by Navient's violation of his rights?

ANSWER: \$ 180,000

If you answered YES to Question 2, answer Question 3. If you answered NO to Question 2, do not answer any more questions.

QUESTION 4: Was Navient's violation of Humphrey's rights willful?

ANSWER: _____ (Yes or No)

If you answered YES to Question 3, answer Question 4. If you answered NO to Question 3, do not answer Question 4 and proceed to Question 5.

QUESTION 5: What amount of money, if any, do you award as punitive damages against Navient?

ANSWER: \$ 120,000

Marilyn Wambler
Presiding Juror

Madison, Wisconsin

Date: 8/7/2019